

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re the matter of:

NO. 20 B 16936

Ramon M. Santiago

Judge A. Benjamin Goldgar

Debtors

Chapter 13 (Lake)

NOTICE OF MOTION

TO:

Ramon M. Santiago
1635 Station Park Drive
Grayslake, IL 60030
Via regular mail

David M. Siegel
Via electronic notification

Glenn B. Stearns
Via electronic notification

PLEASE TAKE NOTICE that on September 17, 2021 at 9:30 a.m., I will appear before the Honorable A. Benjamin Goldgar, Bankruptcy Judge, or any judge sitting in that judge's place, and present the Motion of Ford Motor Credit Company LLC, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **160 817 7512** and the password is **623389**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Christopher H. Purcell
112 Cary Street
Cary, Illinois 60013
Shermlaw13@aol.com
Phone: (312) 372-1487

FORD MOTOR CREDIT COMPANY LLC

By: /s/ Christopher H. Purcell
One of its Attorneys
Sherman & Purcell, LTD.

CERTIFICATE OF SERVICE

I, Christopher H. Purcell, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on September 3, 2021 before the hour of 5:00 p.m.

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MOTION TO MODIFY AUTOMATIC STAY

Now comes Ford Motor Credit Company LLC (hereinafter the “Movant”), a creditor herein, by SHERMAN & PURCELL, LTD., its attorneys, and moves this Honorable Court for entry of an Order modifying the restraining provisions of §362 of the Bankruptcy Code, and in support thereof respectfully represents as follows:

1. The Movant is a secured creditor of the Debtor. The Statement to Accompany Motions for Relief from Stay is attached hereto and incorporated herein including, but not limited to the description of the collateral.
2. The Debtor has not offered, and Movant. is not receiving, adequate protection for its secured interest or depreciating value and that said motor vehicle is not necessary to an effective reorganization by the Debtor.
3. The Movant will suffer irreparable injury, harm and damage should it be delayed in taking possession of the motor vehicle aforesaid and foreclosing its security interest therein. The Movant requests that Bankruptcy Rule 4001(a)(3) not apply to any Order.
4. The debtor is to make the payments directly pursuant to the terms of the confirmed plan.

Since the filing of the case the Debtor has made the following payments:

10/06/20	10/06/20	8080 REGULAR PAYMENT	945.97
11/09/20	11/09/20	8080 REGULAR PAYMENT	1,000.00
12/02/20	12/02/20	8080 REGULAR PAYMENT	883.19
01/05/21	01/05/21	8080 REGULAR PAYMENT	627.73
02/19/21	02/22/21	8080 REGULAR PAYMENT	318.24
03/23/21	03/23/21	8080 REGULAR PAYMENT	1,564.95
06/30/21	06/30/21	8080 REGULAR PAYMENT	1,500.00

The current default is \$1,010.92 with another payment coming due and owing on September 12, 2021 for an additional \$627.73. This default amount is prior to attorney's fees and costs.

WHEREFORE, the Movant prays that this Honorable Court enter an Order modifying the restraining provisions of §362 of the Bankruptcy Code to permit the said Movant to take possession of and foreclose its security interest in a certain 2018 Ford Edge, VIN 2FMPK3K91JBC28302 and for such other and further relief as this Court may deem just.

Christopher H. Purcell
Sherman & Purcell, LTD.

112 Cary Street

Cary, Illinois 60013

Shermlaw13@aol.com

Phone: (312) 372-1487

Attorney for Ford Motor Credit Company LLC

FORD MOTOR CREDIT COMPANY LLC.

BY: /s/ Christopher H. Purcell
One of its Attorneys